

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
BEAUFORT DIVISION

SHEILA BELL and JOSHUA BELL,

Civil Action No.: 9:25-cv-04788-RMG

Plaintiffs,

v.

**JOINT DISCOVERY PLAN AND
PROPOSED SCHEDULING ORDER**

SANTHAN MANTHIRI and 9121-5848
QUEBEC INC, d/b/a ADVANCE FREIGHT
SERVICES,

Defendants.

Plaintiffs and Defendants, by and through their respective undersigned attorneys, hereby respectfully submit this report as required by Fed. R. Civ. P. 26(f)(3). Counsel for Plaintiffs and Defendants held a telephonic planning meeting on December 5, 2024.

(A) What changes should be made in the timing, form, or requirement for disclosures under Rule 26(a), including a statement as to when disclosures under Rule 26(a)(1) were made or will be made;

The parties agree to submit Rule 26(a) initial disclosures by July 25, 2025.

(B) The subjects on which discovery may be needed, when discovery should be completed, and whether discovery should be conducted in phases or be limited to or focused upon particular issues;

The parties agree that discovery will be needed on the following subjects: liability, causation, and damages. The parties agree that discovery should be completed in accordance with the proposed Consent Scheduling Order and further agree it is not necessary for discovery to be conducted in phases or be limited to or focused upon particular issues.

(C) Any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced;

At this time, there are no issues about disclosure or discovery of electronically stored information. The parties reserve the right to supplement this response and/or seek the assistance of the Court should any such issue arise in the future.

(D) Any issues about claims of privilege or of protection as trial-preparation materials, including – if the parties agree on a procedure to assert these claims after production-whether to ask the court to include their agreement in an order;

There are no issues regarding claims of privilege or of protection as trial-preparation materials at this time. The parties acknowledge that such issues may arise in the future and, where appropriate, the parties will seek a consent order to resolve the issue. The parties reserve the right to supplement this response.

(E) What changes should be made in the limitations on discovery imposed under these rules or by local rule, and what other limitations should be imposed; and

The parties agree that no limitations on discovery other than those already contained in the Federal Rules of Civil Procedure should be imposed.

(F) Any other orders that should be entered by the court under Rule 26(c) or under Rule 16(b) and (c).

The parties have agreed to the proposed Consent Scheduling Order herein and respectfully request that the Court adopt the deadlines proposed therein.

Consent Proposed Scheduling Order

1. Motions to join other parties and amend the pleadings shall be filed no later than August 25, 2025.

2. Expert witnesses shall be disclosed by Plaintiff by December 1, 2025.

3. Expert witnesses shall be disclosed by Defendants by December 30, 2025.

4. Record custodian affidavits proposed for trial shall be filed and served by January 6, 2026. Objections to affidavits must be made within 14 days of the disclosure.

5. Discovery shall be complete by February 2, 2026. All discovery requests shall be served in time for the responses thereto to be served by this deadline. De bene esse depositions must be completed by discovery deadline. No motions relating to discovery shall be filed until counsel have consulted and attempted to resolve the matter as required by Local Civil Rule 7.02.

6. All dispositive motions and Daubert motions shall be filed on or before February 16, 2026.

7. This case is subject to being called for jury selection and/or trial or after May 4, 2026.

The Parties have all agreed to waive all 26(a)(1) initial disclosures.

s/ Jonathan D. Graham
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